

EXHIBIT B

Subject: Temujin Delaware v. Abittan et al. Case No. 20CV372622
Date: Wednesday, November 24, 2021 at 4:28:15 PM Pacific Standard Time
From: Stephen C. Holmes
To: Brianna Pierce, Constantine Economides
CC: Craig Hansen, Gina Q. Huerta, Collin Greene, Phil Yeager
Attachments: image001.jpg

Constantine and Brianna:

Temujin Delaware believes that Abittan's recently-filed cross-complaint is defective for many of the reasons previously identified with respect to Abittan's federal complaint.

Accordingly, Temujin Delaware plans to file a demurrer to Abittan's cross-complaint.

Under CCP 430.41, we would like to meet and confer with you by telephone to determine whether an agreement can be reached that would resolve the objections to be raised in the demurrer.

Please let us know what times you are available on Tuesday, November 30, and/or Wednesday, December 1 to meet and confer with us about this.

Many thanks and have a good Thanksgiving.

Regards,

STEPHEN C. HOLMES



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